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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TYLER MILLER, an individual,

Plaintiff,

Case No. 3:23-cv-00293-SI

DECLARATION OF PETER O. WATTS

vs.

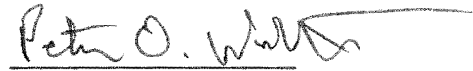
HENRY HEIMULLER, in his official capacity
as Board Member of the Columbia 9-1-1
Communications District; BRUCE HOLSEY,
in his official capacity as Board Member of the
Columbia 9-1-1 Communications District;
JEFF FLATT, in his official capacity as Board
Member of the Columbia 9-1-1
Communications District; and SHELLEY
HENNESSY, in her official capacity as Board
Member of the Columbia 9-1-1
Communications District,

Defendants.

I, Peter O. Watts, declare as follows:

1. I am the City Attorney for Scappoose, Oregon, and I make this declaration in that capacity and based on my personal knowledge. If called upon to do so, I would testify truthfully as follows.
2. During the last two months I have had multiple phone calls with Michael Peterkin, who provides legal services to the Columbia 9-1-1 Communications District.
3. Mr. Peterkin did not confer with me prior to trespassing Councilor Miller. Additionally, Mr. Peterkin had not raised any concerns related to the behavior of Councilor Miller, or his actions during public meetings, during any of our phone calls.
4. My experience with Councilor Miller is that he is extremely polite during public meetings, and I have never observed any disruptions by him.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on March 7, 2023, at West Linn, Oregon.


Peter O. Watts OSB 025368

4889-4840-6613